

Adam E. Polk (SBN 273000)  
Simon Grille (SBN 294914)  
Reid Gaa (SBN 330141)  
**GIRARD SHARP LLP**  
601 California Street, Suite 1400  
San Francisco, CA 94108  
Telephone: (415) 981-4800  
Facsimile: (415) 981-4846  
apolk@girardsharp.com  
sgrille@girardsharp.com  
rgaa@girardsharp.com

*Attorneys for Plaintiffs*

[Additional counsel on signature page]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

BRAYDEN STARK, JUDD OOSTYEN,  
ISAAC BELENKIY, VALERIE BURTON,  
LAURA GOODFIELD and DENOVIA MACK,  
on behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

PATREON, INC.,

Defendant.

Case No. 3:22-cv-03131-JCS

**JOINT STIPULATION AND  
[PROPOSED] ORDER TO EXTEND  
THE BRIEFING SCHEDULE ON  
PLAINTIFFS' MOTION FOR CLASS  
CERTIFICATION**

1 Plaintiffs Brayden Stark, Judd Oostyen, Isaac Belenkiy, Valerie Burton, Laura Goodfield, and  
2 Denovias Mack (“Plaintiffs”) and Defendant Patreon, Inc. (“Defendant” or “Patreon”) (together, the  
3 “Parties”) respectfully submit this Joint Stipulation to Extend the Briefing Schedule on Plaintiffs’  
4 Motion for Class Certification (ECF No. 124), by (1) extending the deadline for Plaintiffs to file any  
5 reply brief in support of their motion for class certification by twelve days (from June 28, 2024 to July  
6 10, 2024); and (2) continuing the hearing on the motion by fourteen days (from August 2, 2024 to  
7 August 16, 2024), or as soon thereafter as is convenient for the Court.

8 WHEREAS, on February 12, 2024, the Court issued an Order granting in part Plaintiffs’  
9 Administrative Motion to Continue Class Certification Schedule (ECF No. 124);

10 WHEREAS, under the Court’s Order, Plaintiffs’ deadline to file their motion for class  
11 certification is April 29, 2024; Patreon’s deadline to file its opposition to class certification is June 12,  
12 2024; Plaintiffs’ deadline to file their reply is currently June 28, 2024; and the hearing on the Motion is  
13 currently set for August 2, 2024;

14 WHEREAS, Plaintiffs intend to support their certification motion with expert reports and  
15 Patreon intends to support its opposition with expert reports;

16 WHEREAS, to ensure that Plaintiffs have adequate time to take discovery of Patreon’s experts,  
17 including depositions, before filing their reply, the Parties agree that an extension of time for Plaintiffs  
18 to file their reply is appropriate;

19 WHEREAS, the Parties thus seek a modest extension of the current briefing schedule, such that  
20 Plaintiffs’ deadline to file their reply in support of class certification would be continued to July 10,  
21 2024, and that the hearing on the Motion would be continued to August 16, 2024, or as soon thereafter  
22 as is convenient for the Court;

23 WHEREAS, the requested extension will not alter the date of any other event or deadline already  
24 fixed by Court order.

25 NOW, THEREFORE, THE PARTIES STIPULATE, pursuant to Civil L.R. 6-2, and respectfully  
26 request that the Court order, that the deadline for Plaintiffs to file their reply in support of their motion  
27

for class certification be extended to July 10, 2024, and the hearing on the Motion for Class Certification be continued to August 16, 2024, or as soon thereafter as is convenient for the Court.

A Proposed Order appears below.

**IT IS SO STIPULATED.**

Dated: March 4, 2024

By: /s/ Simon Grille

Adam E. Polk (SBN 273000)

Simon Grille (SBN 294914)

Reid Gaa (SBN 330141)

**GIRARD SHARP LLP**

601 California Street, Suite 1400

San Francisco, CA 94108

Telephone: (415) 981-4800

Facsimile: (415) 981-4846

apolk@girardsharp.com

sgrille@girardsharp.com

rgaa@girardsharp.com

*Attorneys for Plaintiffs*

Dated: March 4, 2024

By: /s/ Nathan Walker

Fred Norton (SBN 224725)

Nathan Walker (SBN 206128)

Bree Hann (SBN 215695)

Gil Walton (SBN 324133)

**THE NORTON LAW FIRM PC**

299 Third Street, Suite 200

Oakland, CA 94607

Telephone: (510) 906-4900

fnorton@nortonlaw.com

nwalker@nortonlaw.com

bhann@nortonlaw.com

gwalton@nortonlaw.com

*Attorneys for Defendant Patreon, Inc.*

**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: March 5, 2024

  
HON. JOSEPH C. SPERO  
UNITED STATES MAGISTRATE JUDGE

**ATTESTATION**

I, Simon Grille, am the ECF User whose ID and password are being used to file this document.  
In compliance with Civil L.R. 5-1(i)(3), I hereby attest that all counsel have concurred in this filing.

Dated: March 4, 2024

/s/ Simon Grille  
Simon Grille